

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KPN B.V.

Plaintiff,

NOTICE OF MOTION

- against-

Civil Action No. 08 CV 1549

CORCYRA D.O.O.,
KSD PACIFIC, LLC,
MOSHE HAR ADIR, and
YOSSI ATTIA

Defendants

PLEASE TAKE NOTICE that upon the Declaration of Yossi Attia, dated on or about May 30, 2008, and Defendant KSD Pacific, LLC's Memorandum of Law, dated May 30, 2008, the undersigned will move this Court before the Hon. John G. Koeltl, at the United States Courthouse, 500 Pearl Street, Courtroom 12B, New York, New York 10007, on a date to be determined by the Court, for an Order pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(7) dismissing the Complaint as against Defendant KSD Pacific, LLC, together with such other and further relief as to this Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1(b), opposing affidavits and answering memoranda, if any, must be served within ten (10) business days after service of these moving papers.

Dated: New York, New York
May 30, 2008

KAUFMANN, FEINER, YAMIN,
GILDIN & ROBBINS LLP
Attorneys for Defendant KSD Pacific, LLC

By /s/ Kevin M. Shelley
Kevin M. Shelley (KS8149)
777 Third Avenue
New York, New York 10017
(212)755.3100

and

ROBERT M. YASPAN (Pro Hac Vice Admission
Pending)
JOSEPH G. McCARTY (Of Counsel) (Pro Hac
Vice Admission Pending)
LAW OFFICES OF ROBERT M. YASPAN
21700 Oxnard Street, Suite 1750
Woodland Hills, California 91367
(818) 774.9929